

FILED - USDC - NH  
2023 NOV 20 AM 11:57

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

**Karen Testerman, *pro se*  
Lynn-Diane Briggs, *pro se*  
Wayne Paul Saya, Sr., *pro se***

*Plaintiffs*

*Vs*

**DAVID SCANLAN  
SECRETARY OF STATE FOR NEW HAMPSHIRE, et al,  
*Defendants***

*Docket No. 23-cv-00499*

**DECLARATION OF LYNN-DIANE BRIGGS**

**IN SUPPORT OF MY AMENDED MOTION FOR EXPEDITED CONSIDERATION  
FOR PRELIMINARY INJUNCTIVE RELIEF**

I, Lynn-Diane Briggs, *pro se*, in the above-named action, hereby declare that I am a Plaintiff in the above-numbered action; that I reside at 4 Golden Pond Lane Amherst, New Hampshire 03031, and I hereby depose and offer the following declaration to the best of my knowledge and belief:

1. I have been an inhabitant and citizen in the town of Amherst, New Hampshire for about 34-years;
2. During a significant time-period of 34-years I owned and operated a small business dance studio, along with a non-profit 501c3 for the performing arts.

3. I was married to a Merrimack, NH—Boston, MA police officer (deceased) for 26-years, having three sons, one of which is a retired from the U.S. Marine Corp;
4. I am a disabled EMS Advanced 911 Responder;
5. And I am a patriotic Republican, with social media platforms which advance my constitutional ideals and values

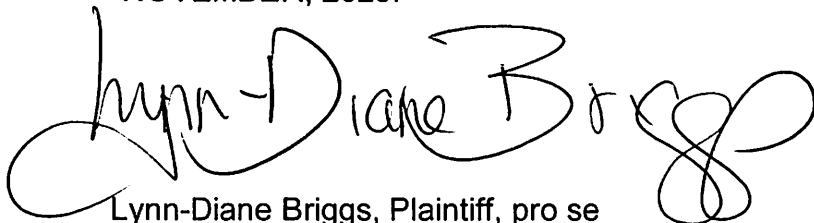
Whereas:

6. From around 2005 until 2022, I worked as Karen Testerman's close advisor and confidant during her Senatorial and Gubernatorial campaigns.
7. During the Summer-time months, around the July, 2023 time-period, I was aware of talk and rumors regarding people being allowed to change party affiliations that was not in conformity with state law.
8. Because there was absolutely no formal discussions, comments, or GOP clarifications regarding this buzz circulating throughout voter circles, I was re-contacted by Plaintiff Karen Testerman who shared with me her attempts to address and correct, what she was led to believe, was a GOP bylaw issue as opposed to a state law issue.
9. In-turn, I learned that Plaintiff Karen Testerman was actively attempting to correct the issue of party affiliation changes, after she had learned that Defendant Chris Ager had a meeting with Defendant David Scanlan at the beginning of February of 2023, and again in August of 2023 with regard to party affiliation issues, which included the party affiliation cut-off date.

10. I was not aware of certain particular details other than GOP by-laws and resolutions were being attempted by Karen Testerman to resolve the closing of party affiliation changes.
11. Later, Plaintiff became aware of an "email" from the Secretary of state, David Scanlan, dated September 13<sup>th</sup>, 2023, to the cities and towns of New Hampshire, that included all supervisors EXHIBIT "A" when it was provided to Plaintiff, by Donna Judge, supervisor of the checklist for Hampstead, NH.
12. During this controversy, I had become more upset when on or around October 9<sup>th</sup> through the 11<sup>th</sup>, I read multiple news articles which were published that outlined how "newly" undeclared voters could interfere with the New Hampshire Republican Presidential Primary. "EXHIBIT C"
13. At this point in time I believed and now am of the belief that my vote-selection for the Presidential primary has become meaningless.
14. When I became aware of a letter dated October 6, 2023, authored by the Merrimack County GOP chairperson, Karen Testerman, that was sent to Defendant Chris Ager, See "EXHIBIT D", I realized there were major legal election implications involved, because a legal restraining order to enjoin the New Hampshire Secretary of State was requested by my friend and Merrimack county chair (Karen Testerman "Karen") for violating election laws that were directly related to my ability to change my party affiliation.
15. Karen has been a friend for decades, dating back to when her daughters were enrolled in my dance studio business.

16. Karen was and continues to be an integral part of my recovery from a brutal assault, where to date I have experienced 15-surgies.
17. During this period in time, I was made aware that as the Merrimack County GOP chair, Karen was blatantly being ignored by Chris Ager, which also impacted my next door city of Merrimack, New Hampshire, when their annual Oktober-fest event was circumvented by Defendant Ager, where he appeared to have held an intentional last minute and simultaneous event in northern New Hampshire against Karen's GOP Merrimack Oktober-fest event. This last minute northern event caused major GOP state and national candidates to cancel "that morning" their confirmed appearances. To me, this appeared to be a targeted event against an extremely party-loyal professional and GOP leader.
18. I believe, when I have a state government that believes any election law can be broken without consequence for the sake of convenience or strategy, and my party chair participates in this law-breaking, my one vote becomes worthless.
19. Because my state government and my party chair have refused to provide relief to me and the GOP, I am now forced to seek help to fix what is now constitutionally broken before the upcoming Presidential primary of January 23<sup>rd</sup>, 2023.

SWORN TO UNDER PAINS AND PENALTIES OF PERJURY THIS 20<sup>TH</sup> DAY OF NOVEMBER, 2023.

A handwritten signature in black ink that reads "Lynn-Diane Briggs". The signature is stylized with large, flowing loops and a long, sweeping underline.

Lynn-Diane Briggs, Plaintiff, pro se  
4 Golden Pond Lane  
Amherst, New Hampshire 03031

Lynbdance@gmail.com  
603-801-6886

### **CERTIFICATE OF SERVICE**

I, Lynn-Diane Briggs, *pro se*, have caused to deliver the named DECLARATION OF LYNN-DIANE BRIGGS IN SUPPORT OF MY AMENDED MOTION FOR EXPEDITED CONSIDERATION FOR PRELIMINARY INJUNCTIVE RELIEF, and the foregoing documents have been served upon the following Defendants and Plaintiffs, certified mail and U.S. postage pre-paid:

David Scanlan, Defendant  
Secretary of State of New Hampshire  
C/O: Brendan Avery O'Donnell  
NH Department of Justice (Concord)  
33 Capitol St  
Concord, NH 03301  
603-271-3650  
Fax: 603-271-2110  
Email: [brendan.a.odonnell@doj.nh.gov](mailto:brendan.a.odonnell@doj.nh.gov)

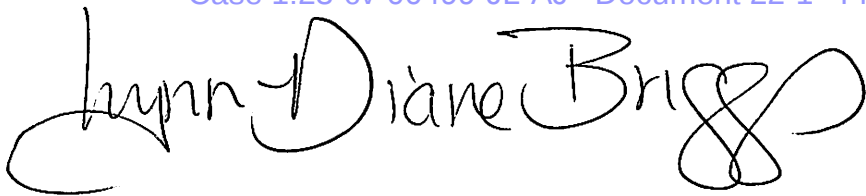
Chris Ager, Defendant  
Chairman  
New Hampshire Republican State Committee  
10 Water St, Concord, New Hampshire 03301

And served upon the following Plaintiffs:

Karen Testerman, Plaintiff, *pro se*  
9 Stone Avenue  
Franklin, New Hampshire 03235  
[Karen@KarenTesterman.com](mailto:Karen@KarenTesterman.com)  
603-934-7111

Wayne Paul Saya, *pro se*  
24 Cadogan Way  
Nashua, New Hampshire 03062  
[waynesaya2@gmail.com](mailto:waynesaya2@gmail.com)  
571-220-3344 mobile

SWORN TO UNDER PAINS AND PENALTIES OF PERJURY this 20th day of November, 2023.

A handwritten signature in black ink that reads "Lynn Diane Briggs". The signature is fluid and cursive, with the first name "Lynn" and last name "Briggs" clearly legible, and "Diane" in the middle.

Lynn-Diane Briggs, Plaintiff, pro se  
4 Golden Pond Lane  
Amherst, New Hampshire 03031  
Lynbdance@gmail.com  
603-801-6886